

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Truth Technologies, Inc.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 1:17-cv-833 (LO/JFA)
)	
Jonathan Arnold, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**NOTICE OF MOTION TO SEAL PORTIONS OF THE DECLARATION OF
JAMES HUGHES AND EXHIBIT 2 TO THE DECLARATION
OF JONATHAN ARNOLD**

PLEASE TAKE NOTICE THAT, pursuant to Local Rule 5, Defendants move this Court for entry of an Order permitting the filing under seal of certain documents filed today in Opposition to Plaintiff's Motion for a Temporary Restraining Order (ECF No. 3): (1) portions of the Declaration of James Hughes and (2) Exhibit 2 to the Declaration of Jonathan Arnold.

A memorandum in support of this Motion is being filed separately. Any person or party wishing to object or support this Motion may submit memoranda in support or in opposition within seven days after the filing of this Motion. In particular, any person objecting to this Motion must file an objection with the Clerk within seven days after the filing of this Motion. If no objections are timely filed, the Court may treat the Motion as uncontested.

Dated: August 2, 2017

By: /s/ Susan R. Podolsky

Susan R. Podolsky
Virginia Bar No. 27891
Law Offices of Susan R. Podolsky
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
Tel: 571.366.1702
Fax: 703.647.6009
spodolsky@podolskylaw.com

Dan Jeremy Schulman (*pro hac vice*
application pending)
The Schulman Law Firm LLP
11 Broadway
Suite 615
New York, NY 10004
Tel: 646.688.5214
Fax: 646.304.1117
djs@djslf.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky
Susan R. Podolsky (Va. Bar No. 27891)
LAW OFFICES OF SUSAN R. PODOLSKY
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
Telephone: (571) 366-1702
Facsimile: (703) 647-6009
spodolsky@podolskylaw.com

Counsel for Defendants